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March 7, 2024

VIA ECF

Hon. Victoria Reznik
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*,
No. 7:13-cv-09239-CS-VR

Dear Judge Reznik:

We represent Defendants Trip.com Group Limited, Trip.com Travel Singapore Pte. Ltd., Skyscanner Ltd., MakeMyTrip India Pvt., Ltd. (the “International Defendants”), and MakeMyTrip, Inc. (collectively, “Trip Defendants”).

We write in response to Your Honor’s March 1, 2024, Order advising that the Court was inclined to grant Plaintiff’s request to order the Defendants to disclose the existence and extent of their insurance coverage, and directing Defendants in this matter to submit a letter setting forth their objections.

The International Defendants object to disclosing their insurance coverage. The International Defendants maintain that there is no personal jurisdiction over those parties, as stated in their letter to Judge Román in the underlying matter that has been reassigned to Your Honor as a related case (*see* 7:23-cv-03586-NSR, ECF No. 58), and as argued in their stayed pending motion to dismiss, served on Plaintiff on December 19, 2023. Indeed, Judge Román identified serious weaknesses in Plaintiff’s theory that “the Court has jurisdiction over the International Defendants with no clear connection to New York other than the fact that their websites could be accessed by individuals in New York.” ECF No. 37 at 8–9 (denying preliminary injunction, including for failure to make a sufficient showing of jurisdiction despite the Court allowing supplemental briefing on that point).

Separately, Defendant MakeMyTrip, Inc. does not have any applicable insurance coverage.

Thank you for your consideration in this matter.

Hon. Victoria Reznik
March 7, 2024
Page 2 of 2

Sincerely,

Anna Menkova